UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MARIBEL BAEZ, et al.,

Plaintiffs,

-against-

NEW YORK CITY HOUSING AUTHORITY,

Defendant.

Case No. 13 Civ. 8916 (WHP)

PLAINTIFFS' NOTICE OF MOTION TO ENFORCE THE REVISED CONSENT DECREE

Pursuant to Paragraph 30 of the Revised Consent Decree, Plaintiffs hereby move for enforcement of the Revised Consent Decree against Defendant New York City Housing Authority. In support of this motion, Plaintiffs submit:

- 1. The Memorandum of Law in Support of Plaintiffs' Motion to Enforce the Revised Consent Decree, dated December 21, 2020.
- 2. The Declaration of Erin M. Meyer, dated December 21, 2020, with exhibits. Plaintiffs respectfully request oral argument on their motion.

Dated: December 21, 2020 Respectfully submitted,

By: /s/ David A. Picon

David A. Picon
Jennifer E. Tarr
Erin M. Meyer
Dominique Kilmartin
PROSKAUER ROSE LLP
11 Times Square
New York, NY 10036
Tel. 212-969-3000

dpicon@proskauer.com jtarr@proskauer.com emeyer@proskauer.com dkilmartin@proskauer.com

By: /s/ Gregory Bass

Gregory Bass
NATIONAL CENTER FOR LAW AND
ECONOMIC JUSTICE
275 Seventh Avenue, Ste. 1506
New York, NY 10001
Tel. 212-633-6967
bass@nclej.org

By: /s/ Nancy S. Marks

Nancy S. Marks
NATURAL RESOURCES DEFENSE
COUNCIL
40 West 20th Street
New York, NY 10011
Tel. 212-727-2700
nmarks@nrdc.org

Attorneys for Plaintiffs